

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	<u>INDICTMENT</u>
UNITED STATES OF AMERICA	:	
	:	21 Cr. <u>277</u> ()
- v. -	:	
	:	
JAMES BRADLEY,	:	
a/k/a "Adullah," and	:	
ARWA MUTHANA,	:	
	:	
Defendants.	:	
-----	X	

COUNT ONE

(Attempted Provision of Material Support and Resources to a
Designated Foreign Terrorist Organization)

The Grand Jury charges:

1. From at least in or about May 2020, up to and including in or about March 2021, in the Southern District of New York and elsewhere, JAMES BRADLEY, a/k/a "Abdullah," and ARWA MUTHANA, the defendants, knowingly attempted to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b) - to wit, services and personnel (including themselves) - to a foreign terrorist organization, to wit, the Islamic State of Iraq and al-Sham ("ISIS"), which at all relevant times has been designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act ("INA"), and is currently designated as such as of the date of the filing of this Indictment, knowing that ISIS was a designated foreign terrorist organization

(as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in section 212(a)(3)(B) of the INA), and that ISIS engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

(Title 18, United States Code, Sections 2339B and 2.)

COUNT TWO

(Conspiracy to Provide Material Support and Resources to a Designated Foreign Terrorist Organization)

The Grand Jury further charges:

2. From at least in or about May 2020, up to and including in or about March 2021, in the Southern District of New York and elsewhere, JAMES BRADLEY, a/k/a "Abdullah," and ARWA MUTHANA, the defendants, and others known and unknown, knowingly combined, conspired, confederated, and agreed together and with each other to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), to a foreign terrorist organization, to wit, ISIS, which at all relevant times was designated by the Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the INA, and is currently designated as such as of the date of the filing of this Indictment.

3. It was a part and an object of the conspiracy that JAMES BRADLEY, a/k/a "Abdullah," and ARWA MUTHANA, the defendants,

and others known and unknown, would knowingly provide ISIS with material support and resources - to wit, services and personnel (including themselves) - knowing that ISIS was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in section 212(a)(3)(B) of the INA), and that ISIS engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), in violation of Title 18, United States Code, Section 2339B.

(Title 18, United States Code, Section 2339B.)

FORFEITURE ALLEGATIONS

4. As a result of planning and perpetrating Federal crimes of terrorism against the United States, as defined in Title 18, United States Code, Section 2332b(g)(5), and as alleged in Counts One and Two of this Indictment, JAMES BRADLEY, a/k/a "Abdullah," and ARWA MUTHANA, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461:

a. All right, title, and interest in all assets, foreign and domestic;

b. All right, title, and interest in all assets, foreign and domestic, acquired and maintained with the intent and

for the purpose of supporting, planning, conducting, and concealing a Federal crime of terrorism against the United States, citizens and residents of the United States, and their property; and

c. All right, title, and interest in all assets, foreign and domestic, derived from, involved in, and used and intended to be used to commit a Federal crime of terrorism against the United States, citizens and residents of the United States, and their property; including but not limited to a sum of money representing the value of the property described above as being subject to forfeiture.

Substitute Assets Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of JAMES BRADLEY, a/k/a "Abdullah," and ARWA MUTHANA, the defendants:

a. cannot be located upon the exercise of due diligence;

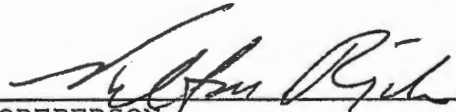
b. has been transferred or sold to, or deposited with, a third person;

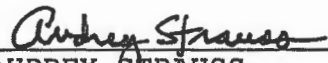
c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty, it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461, to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981(a)(1)(G) and 2332b(g)(5); and Title 28, United States Code, Section 2461.)


FOREPERSON


AUDREY STRAUSS
United States Attorney